

Bradley, Megan

From: wentworth, paul
Sent: Wednesday, October 11, 2017 2:37 PM
To: Mcderment, Denton B
Cc: Bradley, Megan
Subject: Argos Title V Renewal. EPA Review

Hi Denton: I have performed a comprehensive review of the above title V renewal. Besides the review of the permit, my review also included:

A review of the application
Review of the monitoring plan included with the application
Review of the Fact Sheet

My review revealed the monitoring plan was detailed, comprehensive and addressed all the requirements of MACT subpart LLL (Cement MACT). The application also addressed all the applicable requirements for this facility. The fact sheet provided a clear explanation and justification for the inclusion of the MACT and NSPS applicable requirements as well as justification for the requirements deemed non-applicable. For example, there was a detailed explanation regarding interaction between NSPS subpart F and MACT Subpart LLL and a clear delineation of the reason that the NOx requirement in NSPS Subpart F did not apply to this facility of which EPS concurs. The explanations in the FAC sheet showed a thorough understanding of both the history of the plant regarding changes and modifications and the history of the changes in the federal rules regarding Cement plants.

This was a very complex permit Containing upwards of 200 emissions units. The review established that all required emission limits were incorporated into the permit along with the associated monitoring, record keeping and reporting requirements. Therefore I can find no reason to object to the issuance of this permit and commend the permit writer for the fine job they did in developing this renewal.

Regards

Paul T Wentworth, P.E